

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO**

DANIEL GRAND,)	Case No: 1:22-cv-1594
Plaintiff,)	
)	Judge: Bridget Meehan Brennan
v.)	
)	
CITY OF UNIVERSITY HEIGHTS,)	<u>PLAINTIFF'S UNOPPOSED MOTION</u>
OHIO, et al.,)	<u>TO CONTINUE CASE MANAGEMENT</u>
)	<u>CONFERENCE</u>

Now comes Plaintiff Daniel Grand, by and through counsel, and hereby moves this Honorable Court to continue the Case Management Conference scheduled for January 10, 2023.

On November 29, 2022, the Court issued its Notice of Case Management Conference and Order (ECF No. 10), scheduling a Case Management Conference (CMC) for January 10, 2023. Due to trial obligations, Plaintiff's counsel is unavailable on that day. Undersigned counsel conferred via email with counsel of record for all named defendants, and there was no opposition to this motion for a continuance. Undersigned counsel also inquired as to the availability of counsel for the Defendants for any time between January 2 through January 6, or for any time on January 19 or 20, and all counsel confirmed that any of those dates are available to reschedule the CMC.

Accordingly, Plaintiff respectfully requests that the Court continue the CMC and reset the CMC for one of the alternative dates in January when all counsel are available.

CONCLUSION

For all of the foregoing reasons, Plaintiff respectfully requests that the Court GRANT Plaintiff's Motion and Continue the CMC and reset the CMC for one of the available dates in January.

Dated: December 8, 2022

Respectfully submitted,

/s/ Jonathan Gross
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CERTIFICATE OF ELECTRONIC SERVICE

I hereby certify that on November 2, 2022, I electronically filed the foregoing with the Clerk of Court using the CM/ECF System, with consequent service on all parties that have responded.

/s/Jonathan Gross

Counsel for Plaintiff

CERTIFICATE OF CONFERENCE

I certify that I have conferred with opposing counsel and the motion is unopposed.

/s/ Jonathan Gross

Counsel for Plaintiff